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*Attorneys for Defendant KeyBank
National Association*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RESORTS WORLD LAS VEGAS LLC dba
RESORTS WORLD LAS VEGAS,

Plaintiff,

v.

JIA TANG; JING GONG; AI KONG;
KEYBANK NATIONAL ASSOCIATION;
FIRST TECHNOLOGY FEDERAL CREDIT
UNION dba FIRST TECH FEDERAL
CREDIT UNION; DOES 1 through 10,
inclusive; and ROE CORPORATIONS 1
through 10, inclusive,

Defendants.

Case No. 2:25-cv-00307-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINES**

(FIRST REQUEST)

Plaintiff, Resorts World Las Vegas LLC dba Resorts World Las Vegas “Resorts World;” Defendant KeyBank National Association (“KeyBank”); Defendant Jing Gong; and Defendant Ai Kong, (collectively “the Parties”); by and through their respective undersigned counsel, hereby stipulate to extend all applicable deadlines by 60 days with the following background and reasons:

1. Defendant KeyBank removed this action to this Court on February 14, 2025.
2. KeyBank’s deadline to respond to the Complaint is currently February 21, 2025.
3. Defendant Ai Kong’s deadline to respond to the Complaint is currently February 21, 2025.

4. Defendant Jing Gong filed an Answer on February 11, 2025, prior to removal.

5. Defendant First Tech filed an Answer on February 13, 2025, prior to removal.

6. Pursuant to this Court's Minute Order of February 20, 2025 (ECF No. 4), the Discovery Plan and Scheduling Order is currently due by March 31, 2025.

7. Under Federal Rule of Civil Procedure 26(f), a conference must be held by March 10, 2025.

8. The Parties are currently and substantively engaged in attempts at an early resolution and as such request that each of the applicable deadlines be extended for sixty (60) days so they may pursue those efforts.

9. As such, the Parties agree that KeyBank's and Ai Kong's deadline to respond to the Complaint will be April 22, 2025; that the deadline to hold a 26(f) conference will be May 9, 2025; and the deadline to file a Discovery Plan and Scheduling Order will be May 30, 2025.

10. The Parties agree that this stipulation is entered into in good faith and not for the purpose of delay.

IT IS SO STIPULATED.

Dated: February 21, 2025.

Dated: February 21, 2025.

SNELL & WILMER L.L.P.

AI KONG

By: /s/ Kelly H. Dove

By: /s/ Ai Kong

Kelly H. Dove (NV Bar No. 10569)
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Ai Kong
465 147th Place NW
Bellevue, WA 98007
Pro Se

1 Dated: February 21, 2025.

Dated: February 21, 2025.

2 JING GONG

SKLAR WILLIAMS PLLC


3 By: /s/ Jing Gong

By: /s/ Anthony R. Ager

4 Jing Gong
5 14907 SE 64th St.
6 Bellevue, WA 98006
7 *Pro Se*

Anthony R. Ager (NV Bar No. 7969)
410 South Rampart Blvd., Suite 350
Las Vegas, NV 89145
Attorneys for Plaintiff Resorts World Las Vegas LLC

8
9 **IT IS SO ORDERED.**

10 
11 UNITED STATES DISTRICT JUDGE OR
12 UNITED STATES MAGISTRATE JUDGE

13 DATED: 2/25/2025

14 Respectfully submitted by:

15 SNELL & WILMER L.L.P.

16 By: /s/ Kelly H. Dove

17 Kelly H. Dove, Esq. (NV Bar No. 10569)
18 Jesse Hogin (NV Bar No. 14884)
19 1700 S. Pavilion Center Dr., Ste 700
20 Las Vegas, Nevada 89135
21 *Attorneys for Defendant Wells Fargo Bank, N.A.*

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CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2025, I served the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINES** by the methods indicated below.

☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below:

☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

☒ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

AI KONG
missaikong@gmail.com

JING GONG
leogong99@gmail.com

☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for service upon the Plaintiff and First Tech in the above-referenced case.

DATED: February 21, 2025

/s/ Kelly H. Dove

An employee of Snell & Wilmer L.L.P.

4936-9908-7390